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October 10, 2008
via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE May Monthly Report (4/01/08-4/30/08)

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated September 10, 2008.

We are filing an amended report which will correct the Calendar Year-to-Date totals and provide further clarifying information regarding the items referred to in your letter.

You also posed a question with respect to expenditures for "Database Polling Services "and "fundraising calls". During the reporting period, expenditures were made for phonebank services in connection with fundraising solicitations to union members and other individuals within the union's solicitable class and were therefore properly reported on line 21 as an Operating Expense. Similarly, SEIU COPE paid to participate in a consortium for polling services in order to receive polling results with respect to various candidates and issues. This expenditure was not for a public communication or an in-kind contribution to a candidate and was properly reported as an Operating Expense.

Your final question concerned a contribution to a State Party. We have determined that the contribution to the North Carolina Democratic Party was made to their Federal account and that will be reflected in our amended Form 3x. This is our only contribution to their federal account this year so there is no limitation affecting this contribution.

Please feel free to contact me if you have any further questions

Sincerely,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs
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